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14 WILLIAM TAYLOR

15 **UNLIMITED JURISDICTION**
16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES**

18 WILLIAM TAYLOR,

19 Plaintiff,

20 vs.

21 CITY OF BURBANK and DOES 1 through
22 100, inclusive,

23 Defendants.

CASE NO. BC 422 252

[Assigned to the Hon. John L. Segal,
Judge, Dept. "50"]

DECLARATION OF SELMA I. FRANCIA
IN SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEY'S FEES

Date: July 9, 2012
Time: 8:30 a.m.
Dept.: "50"

[Filed concurrently with Points &
Authorities and Declarations of
Christopher Brizzolara, Douglas
Benedon, and Selma Francia]

Action Filed: September 22, 2009
Trial: March 5, 2012

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1 I, Selma I. Francia, do declare as follows:

2 1. This declaration is based on my personal knowledge. I am over 18 years of
3 age, and if called to testify regarding the contents of this declaration, I could and would
4 competently testify thereto.

5 2. I attended the University of California in Los Angeles, California from 1995 -
6 1997, and obtained a Bachelor of Arts degree in Political Science in 1997. Shortly
7 thereafter, I attended UCLA Extension in Los Angeles, California, completed the Attorney
8 Assistant Training Program and obtained a paralegal certificate in 1997.

9 3. I have been employed as a paralegal with the Law Offices of Gregory W.
10 Smith since June 1997 to the present, with the exception of a period of approximately
11 seven months in 2007. During this time, I have worked as a paralegal primarily in the
12 area of employment litigation. I have gained most of my practical experience in providing
13 assistance to Plaintiff's trial counsel, Gregory W. Smith, in his very active civil litigation
14 practice specializing in cases involving sexual harassment, racial, disability and age
discrimination, wrongful termination, retaliation, and wage claim matters.

15 4. Between approximately January 2007 through August 2007, I was employed
16 by the firm of Eisenberg Raizman Thurston & Wong LLP which specialized in handling
17 complex litigation matters for businesses and individuals. During this time, I worked as a
18 paralegal in matters involving entertainment and complex commercial business litigation
19 actions, and employment litigation.

20 5. I have considerable understanding of trial requirements in assisting in the
21 preparation of cases for trial. In addition, I have extensive knowledge of civil procedural
22 rules relating to motion practice and discovery, and am also fairly familiar with appellate
23 procedural rules.

24 6. I participated in providing assistance in this litigation matter on behalf of the
25 Plaintiff, including, *inter alia*, preparing correspondence, communicating with the Plaintiff,
26 communicating with opposing counsel, reviewing file materials, and trial preparation. The
27 activities I performed were contemporaneously recorded (i.e., on the day that the activity
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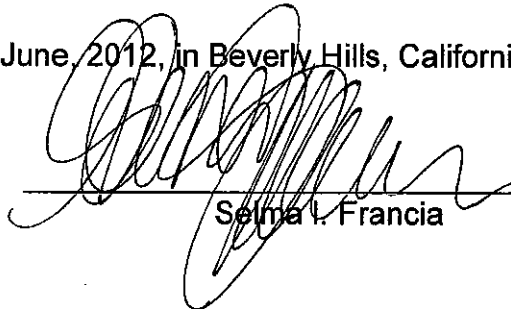
1 was done, or within a short time thereafter), and subsequently placed in computers. My
2 time was recorded for the actual time spent on each activity. A true and accurate
3 description of many of my services and the amount of time expended in performing such
4 services on this case is attached hereto as Ex. "1". I have spent at least one hundred
5 eight point five (118.5) hours working on this action.

6 7. The reasonable rate for my legal services is in the range of \$200.00 per
7 hour. While employed at the offices of Eisenberg Raizman Thurston & Wong LLP in
8 2007, my hourly rate was billed at \$175.00 per hour for paralegal services.

9 I declare the foregoing to be true and correct under penalty of perjury under the
10 laws of the State of California.

11 Executed this 11th day of June, 2012, in Beverly Hills, California.

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Selma I. Francia

EXHIBIT “1”

William Taylor v. City of Burbank
Los Angeles County Superior Court Case No. BC 422 252

Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
06-15-09	Conference call with G. Smith and Client to fill out and file DFEH Charge and request Right-to-Sue Notice; Letter to Chief of Police Timothy Stehr enclosing copy of DFEH Charge & RTS Notice; Serve DFEH Charge & Right-to-Sue Notice Re City of Burbank upon the Office of the City Clerk; Letter to Client	1.6	SIF
06-26-09	Proofread and format G. Smith's letter to Carol Humiston	0.2	SIF
06-30-09	Take dictation from G. Smith re letters to Carol Humiston	0.3	SIF
07-29-09	Proofread and revise proof of service re Plaintiff's Government Claim; Prepare letter to City Clerk's Office, serve same on 07/30/09	0.5	SIF
08-19-09	Format letter to Ericka Reinke of the City of Burbank re conducting investigation re Client's claims	0.2	SIF
08-26-09	Format letter to Ericka Reinke of the City of Burbank re interview	0.2	SIF
08-27-09	Take dictation from G. Smith revising 08/26/09 letter to Ericka Reinke of the City of Burbank re interview	0.2	SIF
09-18-09	Proofread, format, & prepare summons, complaint, civil case cover sheet & addendum for filing	1.0	SIF
09-21-09	Take dictation from G. Smith re letter to Chief Stehr re PORTOS investigative material; Make revisions requested by Client to complaint; Prepare revised complaint for filing	0.4	SIF
09-24-09	Draft 170.6 Peremptory Challenge and prepare same for filing	0.2	SIF
10-02-09	Format G. Smith's letter to Judy Wilke of the City of Burbank, Mgmt. Svcs. Dept.	0.2	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
10-06-09	Prepare caption page to file proof of service of summons, etc. re Defendant with Court	0.2	SIF
10-09-09	Attach proof of service to conformed copy of Plaintiff's 170.6 Peremptory Challenge, Court's Minutes Entered 09/28/09 re Peremptory Challenge, and Court's Minutes Entered 10/01/09 re 170.6 CCP re Judicial Re-Assignment	0.2	SIF
10-11-09	Revise service date (serve on 10/12/09) and service recipients on proof of service to conformed copy of Plaintiff's 170.6 Peremptory Challenge, Court's Minutes Entered 09/28/09 re Peremptory Challenge, and Court's Minutes Entered 10/01/09 re 170.6 CCP Judicial Re-Assignment and prepare for service on 10/12/09; Letter to Client re deposition; Letter to Client re Defendant's Employment Law Form Interrogatories #1	0.7	SIF
10-12-09	Take dictation from G. Smith re letter to defense counsel re Plaintiff's deposition dates	0.2	SIF
10-20-09	Take dictation from G. Smith re letter to defense counsel re producing Plaintiff's documentation; Take dictation from G. Smith re letter to Judie Wilkie re responding to her letter of October 9, 2009	0.4	SIF
10-22-09	Format G. Smith's letter to K. Pelletier responding to her 10/22/09 letter	0.2	SIF
10-26-09	Take dictation from G. Smith re letter to K. Pelletier re letter from Chief Stehr	0.2	SIF
11-02-09	Draft Notice of Change of Address, etc. and prepare same for filing & service; Draft Notice of Related Cases and prepare same for filing & service; Format, fax, and mail two letters from G. Smith to K. Pelletier	1.4	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
11-09-09	Take dictation from G. Smith re letter to K. Pelletier re letter from Judie Wilke; Letter to Kristin Pelletier, Esq. confirming discovery extension re Plaintiff's response to Employment Form Interrogatories from 11/09/09 to 11/16/09	0.4	SIF
11-13-09	Compare & verify that each document request in Defendant's notice of deposition of plaintiff & request for document production to Defendant's document demand are identical; Format and serve Plaintiff's responses to Document Demand #1 and Employment Law Form Interrogatories #1 based upon G. Smith's drafts; Draft & serve Plaintiff's Objections & Responses to Defendant's request to produce document at deposition	3.0	SIF
11-16-09	Format letter from G. Smith to K. Pelletier responding to K. Pelletier's 11/16/09 letter; Format letter from G. Smith to K. Pelletier re Plaintiff's deposition sessions; Letter to Client re deposition sessions; Draft & serve deposition notice of Tim Stehr; Letter to Client re Chief Tim Stehr deposition	0.8	SIF
11-20-09	Letter to Client re deposition	0.2	SIF
11-25-09	Take dictation from G. Smith re letter to Kristin Pelletier	0.2	SIF
12-14-09	Draft & serve Plaintiff's Notice of Recusal Reassignment; Format and proofread Plaintiff's First Amended Complaint	1.2	SIF
12-15-09	Prepare & serve Plaintiff's Notice of Case Management Conference; Letter to Kristin Pelletier enclosing stipulation re filing 1 st amended complaint for review	0.5	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
12-17-09	Letter to Robert Tyson responding to discovery meet & confer letter re G. Smith out of state and unable to respond until after 01/10/2010	0.2	SIF
12-18-09	Letter to Client re deposition transcript; Letter to Client re 2 nd session of deposition; Letter to Kristin Pelletier requesting dates to reschedule Chief Tim Stehr's deposition	0.6	SIF
01-13-10	Letter to Kristin Pelletier requesting continuance of the 2 nd session of Plaintiff's deposition	0.2	SIF
01-15-10	Draft & serve Plaintiff's Notice of Continuance of Case Management Conference	0.3	SIF
01-28-10	Letter to Robert Tyson responding to letter re service of Plaintiff's amended discovery responses informing that G. Smith agrees to extension of deadline for motions to compel	0.2	SIF
02-16-10	Letter to Client re Volume 2 of deposition transcript	0.3	SIF
02-16-10	Take dictation from G. Smith re discovery meet & confer letter to K. Pelletier re Defendant's discovery responses	0.3	SIF
02-22-10	Prepare Plaintiff's Case Management Statement	0.5	SIF
02-23-10	Revise & serve Plaintiff's Case Management Statement	0.2	SIF
02-24-10	Draft & serve deposition notices for witnesses: T. Stehr, M. Ramos, R. Quesada, and J. Murphy; Prepare Deposition Subpoenas for M. Ramos and J. Murphy; Letter to Client re deposition schedule	1.0	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
03-03-10	Type separate statements re portions of Plaintiff's Document Demand #1, Form Interrogatories-Employment #1, and Special Interrogatories #1 to Defendant for filing with Discovery Motions to Compel	3.3	SIF
03-05-10	Attach proofs to Plaintiff's Pitchess motion & discovery motion to compel, prepare same for messenger filing & service today; Draft & serve amended deposition notices for witnesses: T. Stehr, M. Ramos, R. Quesada, and J. Murphy; Prepare Deposition Subpoenas for M. Ramos and J. Murphy	2.7	SIF
03-09-10	Letter to Client re revised deposition schedule	0.2	SIF
03-10-10	Letter to witness M. Ramos enclosing Deposition Subpoena	0.2	SIF
03-22-10	Draft & serve amended deposition notice for witness: T. Stehr; Letter to Client re Day 3 of deposition; Letter to Client re T. Stehr's deposition and R. Quesada's deposition	0.5	SIF
03-23-10	Letter to Client re change in location re deposition on 04/01/10	0.2	SIF
03-31-10	Format letter by G. Smith to Chief of Police Scott LaChasse	0.2	SIF
04-02-10	Letter to Kristin Pelletier cancelling Chief Tim Stehr's deposition set for 04/06/10	0.2	SIF
04-05-10	Format letters by G. Smith to Chief of Police Scott LaChasse and Kristin Pelletier	0.2	SIF
04-06-10	Letter to Client enclosing re IA Interviews	0.2	SIF
04-07-10	Gather and copy documents for David Gascon; Letter to David Gascon enclosing same for messenger delivery	0.5	SIF
04-08-10	Letter to David Gascon enclosing notice of termination from the City of Burbank; Format G. Smith's letter to Richard Kreisler regarding the Skelly Hearing	0.2	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
04-12-10	Letter to David Gascon enclosing further documentation; Letter to Christopher Brizzolara re IA interviews	0.5	SIF
04-13-10	Letter to David Gascon enclosing transcribed IA interviews re J.J. Puglisi	0.2	SIF
04-19-10	Take dictation from G. Smith re letter to Chief Scott LaChasse	0.2	SIF
04-21-10	Draft & serve Plaintiff's Notice of Continuance of Pitchess Motion & Motions to Compel; Draft Stipulation and Order Re: Request to Advance Hearing Date Regarding Plaintiff's Pitchess Motion & Motions to Compel	0.8	SIF
04-22-10	Letter to Kristin Pelletier enclosing Stipulation and Order Re: Request to Advance Hearing Date Regarding Plaintiff's Pitchess Motion & Motions to Compel for review & signature	0.3	SIF
04-23-10	Format G. Smith's letter to Kristin Pelletier re Plaintiff's deposition and J. Murphy's deposition	0.2	SIF
04-27-10	Take dictation from G. Smith re letter to Chief Scott LaChasse and Captain Craig Varner	0.2	SIF
04-28-10	Format letter from G. Smith to Chief Scott LaChasse	0.2	SIF
04-29-10	Attach proof of service to Stipulation and Order Re: Request to Advance Hearing Date Regarding Plaintiff's Pitchess Motion & Motions to Compel, prepare same for filing & service	0.2	SIF
05-03-10	Letter to Kristin Pelletier confirming Plaintiff's ex parte hearing for 05/05/10 to request continuance of Defendant's Motion for an Evidence Sanction	0.2	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
05-04-10	Attach proof of service to and serve conformed copy of Stipulation and Order Re: Request to Advance Hearing Date Regarding Plaintiff's Motion: 1) for Discovery of Peace Officer Personnel and Other Records Regarding William Taylor; and 2) to Compel Further Responses to Interrogatories and Request for Production; Draft & serve Plaintiff's 2 nd Notice of Continuance of Pitchess Motion & Motions to Compel; Letter to Kristin Pelletier informing of continuance of Plaintiff's ex parte hearing to request continuance of Defendant's Motion for an Evidence Sanction from 05/05/10 to 05/07/10	0.7	SIF
06-04-10	Proofread and re-format Plaintiff's 2 nd Government Claim, prepare letter to City Clerk's Office, and prepare same for filing by messenger	0.5	SIF
06-09-10	Attach proof of service to Plaintiff's Opposition to Evidence Sanctions and prepare same for filing by messenger and service by overnight mail	0.3	SIF
06-16-10	Draft & serve deposition notices for witnesses: Captain J. Lowers, Captain P. Lynch, Captain C. Varner, Police Administrator C. Magnante, Lt. A. Dermenjian, Lt. R. Caruso, Executive Asst. P. Peters, & Sgt. J. Duran; Letter to Client re deposition schedule	1.2	SIF
06-17-10	Fax 2 pp. transcription audio cassette recording to Kristin Pelletier, Esq.	0.2	SIF
06-18-10	Proofread and format G. Smith letter to Michael Stone, Esq.	0.2	SIF
06-21-10	Draft & serve Plaintiff's 3 rd Notice of Continuance of Pitchess Motion & Motions to Compel	0.4	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
07-02-10	Draft & serve Plaintiff's 1 st amended deposition notice for witness C. Magnante	0.2	SIF
07-03-10	Prepare for service on 07/06/10 re Supplemental DFEH Charge & Supplemental Right-to-Sue Notice Re City of Burbank filed on 06/10/10	0.3	SIF
07-29-10	Letter to Kristin Pelletier, Esq. enclosing stipulation to permit Plaintiff to file 1 st amended complaint	0.5	SIF
08-09-10	Prepare S. Francia declaration re ex parte notice regarding <i>in camera</i> inspection	0.3	SIF
08-24-10	Format and attach proofs of service to each of Plaintiff's Pitchess Motions re Eric Rosoff and Jay Jette; Format and attach proofs of service to each of the <u>revised</u> Plaintiff's Pitchess Motions re Eric Rosoff and Jay Jette, and prepare same for filing & personal service on 08/25/10	1.5	SIF
08-25-10	Attach proof of service to Plaintiff's opposition to Request for a New Hearing on Pitchess Motion re Palma Notice	0.4	SIF
08-31-10	Prepare memo to attorney service re delivery of payment to Linda Comstock re transcript of proceedings held on 08/30/10	0.2	SIF
09-03-10	Attach proof of service to Plaintiff's 2 nd Amended Government Claim, prepare letter to City Clerk's Office, prepare same for filing by certified mail	0.3	SIF
09-17-10	Draft & serve Plaintiff's Notice of Ruling re Defendant's Ex Parte Hearing to have Plaintiff's Pitchess Motions Filed Under Seal	0.4	SIF
09-18-10	Letter to Client re Defendant's Document Demand #2 and Special Interrogatories #1	0.3	SIF

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DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
09-24-10	Review Plaintiff's discovery responses to obtain list of healthcare providers to include in Plaintiff's expert witness designation, and email to Plaintiff re same	0.2	SIF
10-14-10	Draft, serve, & prepare for filing Plaintiff's Notice of Continuance of Court Matters Set for Hearing on October 15, 2010	0.5	SIF
10-20-10	Letter to Kristin Pelletier	0.2	SIF
10-29-10	Attach proof of service to, serve, and fax file Plaintiff's Objection to, Motion to Strike, and Response to Defendant City of Burbank and Alleged "DOE Officers 11 and 12" Opposition to Plaintiff's Motion for Discovery of Peace Officer Personnel and Other Records, prepare Facsimile Transmission Cover Sheet; Letter to Kristin Pelletier and Carol Humiston confirming telephonic ex parte notice for 11/04/10 to allow Plaintiff to file first amended complaint	0.7	SIF
12-01-10	Begin proofreading and formatting Plaintiff's Pitchess Motion re Merrick Bobb Report	0.5	SIF
12-02-10	Finish proofreading, formatting, and serve Plaintiff's Pitchess Motion re Merrick Bobb Report, prepare same for filing on 12/03/10	0.8	SIF
12-16-10	Attach proof of service, serve, and prepare for filing Plaintiff's Motion for Leave to File 1 st Amended Complaint	0.2	SIF
12-21-10	Draft & serve Plaintiff's Notice of Ruling regarding court proceeding held on 12/15/10 per G. Smith's notes	0.4	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
01-11-11	Revise proof of service re Plaintiff's reply brief on Pitchess Motion re Bobb Report, prepare Facsimile Transmission Cover Sheet, fax file & serve same; Attach proof of service to Plaintiff's 1 st Amended Complaint to file & serve on 01/12/11 per Clerk's request; Letter to Defense Counsel enclosing copy of Plaintiff's 1 st Amended Complaint	0.5	SIF
03-02-11	Draft & serve Plaintiff's Notice of Continuance of Hearing Date Regarding <i>Pitchess</i> Motion	0.3	SIF
03-18-11	Format Plaintiff's response to Defendant's Special Interrogatories #2 drafted by G. Smith and prepare same for service; Letter to Ronald Frank, Esq. enclosing signed Joint Status Conference Statement Re 04/06/11 Hearing	0.4	SIF
04-06-11	Letter to Solomon Gresen, Esq. enclosing copies of multiple pages from Volume 2 of Plaintiff's deposition transcript; Draft & serve Plaintiff's Second Notice of Continuance of Hearing Date Re Pitchess Motion (re Jette & Rosoff)	0.5	SIF
04-18-11	Draft & serve deposition notices for the following witnesses: M. Fladd, S. LaChasse, T. Stehr (4 th amended), J. Gardiner, & R. Kreisler, prepare deposition subpoenas for witnesses J. Gardiner & R. Kreisler	1.2	SIF
04-19-11	Take dictation from G. Smith re letter to Robert Tyson re response to discovery meet & confer letter	0.2	SIF
04-21-11	Prepare attorney service instructions re Deposition Subpoena for witness Richard Kresiler	0.2	SIF
04-22-11	Letter to Ronald Frank, Esq. inquiring whether witness James Gardiner will be produced for deposition and requesting location agreement; Letter to Client re deposition schedule	0.4	SIF

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DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
05-19-11	Draft Joint Status Report and email same for G. Smith's review & approval	0.4	SIF
05-31-11	Letter to Ronald Frank, Esq. informing that depositions noticed by Plaintiff starting in mid-June 2011 are being rescheduled except for R. Kreisler's deposition	0.2	SIF
06-01-11	Draft proposed orders to file Plaintiff's Pitchess Motions re Lt. Jay Jette & Lt. Eric Rosoff; Letter to all counsel to review both proposed orders and to send us any requested changes, fax same; Serve Plaintiff's Pitchess Motions re Lt. Jay Jette & Lt. Eric Rosoff and prepare same for filing by B. Koron on 06/02/11	1.3	SIF
06-03-11	Format Plaintiff's amended response to Defendant's Special Interrogatories #2; Letter to Client re amended response to Defendant's Special Interrogatories #2	0.7	SIF
06-06-11	Revise caption page and 2 pp. re J. Jette Pitchess Motion to reflect new hearing date, attach proofs of service, and prepare same for filing & service on 06/07/11; Revise caption page and 2 pp. re E. Rosoff Pitchess Motion to reflect new hearing date, attach proofs of service, and prepare same for filing & service on 06/07/11	1.5	SIF
06-07-11	Serve respective Pitchess Motions re J. Jette and E. Rosoff by fax, overnight mail, and email; Draft & serve Plaintiff's Notice of Ruling re Telephone Conference held on 06/01/11	2.5	SIF
06-08-11	Attach proof of service to Plaintiff's amended response to Defendant's Special Interrogatories #2 and prepare same for service on 06/09/11	0.2	SIF

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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
06-09-11	Letter to Robert Warshaw confirming agreement between himself and G. Smith in continuing R. Kreisler's deposition	0.2	SIF
06-24-11	Draft pleading re Original Signed Proofs of Service on Michael P. Stone, Esq. Re: Plaintiff's respective Pitchess Motions Re J. Jette & E. Rosoff, prepare attorney service instructions for filing of same	1.0	SIF
06-28-11	Format G. Smith's letter to Robert Tyson re protective order, fax & mail same to Robert Tyson	0.2	SIF
07-07-11	Take dictation from G. Smith re letter to Robert Tyson re non-receipt of anonymous packages or letters	0.2	SIF
07-08-11	Attach proof of service to [Proposed] Protective Order Re: Documents and Items Produced Pursuant to Pitchess Motions, serve same by fax, email, & mail; Prepare document entitled Conformed Copy Exemplars of Protective Orders Regarding Documents and Other Items Produced Pursuant to Pitchess Motions Issued by L.A. County Superior Judges in Other FEHA & Labor Code Section 1102.5 Whistleblower Retaliation Cases, serve same by fax, email, & mail, prepare attorney service instructions for filing of documents; Take dictation from G. Smith re 2 nd letter to Robert Tyson re non-receipt of anonymous packages or letters	2.1	SIF
08-25-11	Format and proofread Plaintiff's opposition to City's motion to compel special interrogatories, set no. 2, prepare same for filing & service on 08/26/11, prepare attorney service instructions	1.9	SIF

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DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
08-26-11	Format G. Smith's letter to Ronald Frank and Robert Tyson	0.2	SIF
09-13-11	Letter to Client 3 rd and 4 th sessions of deposition; Draft amended deposition notices for witnesses Marsha Ramos and James Gardiner and prepare for service on 09/14/11	0.5	SIF
09-16-11	Take dictation from G. Smith re letter to Ronald Frank and Robert Tyson re missing documents from Pitchess production	0.2	SIF
09-19-11	Letter to Client re deposition schedule	0.2	SIF
09-28-11	Letter to Defense Counsel confirming extension for Plaintiff to provide court-ordered further responses to Special Interrogatories #2; Letter to Ronald Frank enclosing copy of deposition subpoena for witness James Gardiner; Draft amended deposition notices for witnesses T. Stehr and M. Fladd; Letter to Client re deposition location change; Letter to Client re additional deposition schedule	1.0	SIF
09-29-11	Letter to Client re Defendant's Form Interrogatories-Employment #2	0.3	SIF
10-03-11	Draft amended deposition notice for witness M. Fladd with location details for service on 10/04/11; Letter to Client re location information for witnesses' depositions	0.4	SIF
10-05-11	Prepare Plaintiff's supplemental discovery requests (document demand, employment law form interrogatories, special interrogatories, rfa) for messenger service on 10/07/11; Letter to Client re Defendant's Document Demand #3	1.2	SIF
10-10-11	Create draft of Plaintiff's response to Form Interrogatories-Employment Law #2 for G. Smith to finalize	0.5	SIF
10-14-11	Letter to Defense Counsel confirming extension for Plaintiff to respond to Form Interrogatories-Employment Law #2	0.2	SIF

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DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
10-17-11	Draft Plaintiff's expert witness designation for G. Smith's review & finalizing, serve same	0.5	SIF
10-19-11	Search file for letters and documents re Skelly; Letter to Dr. Paul Kim enclosing IA materials; Letter to Client re M. Ramos' deposition	1.2	SIF
10-24-11	Draft & serve deposition notice and request for production of documents for expert witness D. Weiner; Draft & serve sixth amended deposition notice for witness T. Stehr	0.5	SIF
10-27-11	Format Plaintiff's Objections to Defendant's Form Interrogatories-Employment Law #2, attach proof of service, and serve same	0.2	SIF
10-28-11	Letter to Defense Counsel confirming discovery extension re Document Demand #3 from 11/01/11 to 11/08/11; Letter to Client re Volume 3 deposition transcript	0.4	SIF
11-03-11	Letter to Client re Volume 5 deposition transcript	0.2	SIF
11-07-11	Letter to Ronald Frank, Esq. confirming discovery extension re Document Demand #3 from 11/08/11 to 11/09/11; Take dictation from G. Smith responding to Ronald Frank's letter regarding trial continuance, extension of motion in limine filing deadline, and settlement conference	0.4	SIF
11-08-11	Letter to Client re Volume 4 deposition; Format Plaintiff's response to Defendant's Document Demand #3 and print verification	1.2	SIF
11-09-11	Copy and serve Plaintiff's response to Defendant's Document Demand #3; Letter to Dr. Paul Kim enclosing additional documentation for his review	0.3	SIF

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DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
11-10-11	Draft & serve Plaintiff's Notice of Posting of Jury Fee Deposit on Behalf of Plaintiff and Notice of Judicial Reassignment; Draft & serve Plaintiff's Notice of Voluntary Settlement Conference; Letter to Client informing of VSC on 11/16/11	1.0	SIF
11-11-11	Letter to Ronald Frank, Esq. enclosing Plaintiff's production of documents re Defendant's Document Demand #3	0.7	SIF
12-13-11	Review and edit transcribed & translated interview of Jose Alvarenga	0.6	SIF
12-30-11	Review and edit transcribed & translated interview of Romero 1 (work)	1.5	SIF
01-04-12	Review and edit transcribed & translated interview of Romero 3 (work)	0.5	SIF
01-05-12	Finish reviewing and editing transcribed & translated interview of Romero 3 (work)	0.2	SIF
01-24-12	Letter to Karen Smith enclosing Plaintiff's documentation re damage calculation	0.5	SIF
01-26-12	Letter to Karen Smith enclosing Plaintiff's additional documentation re damage calculation	0.5	SIF
02-06-12	Letter to Ronald Frank enclosing copies of Karen Smith's testimony list and telephone conversation notes	0.2	SIF
02-08-12	Letter to Karen Smith enclosing Plaintiff's additional documentation re revision of damage calculation; Organize & label documentation	1.8	SIF

William Taylor v. City of Burbank
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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
02-09-12	Draft Notice to Appear at Trial in Lieu of Subpoena [CCP §1987] for G. Smith to review & finalize; Draft Trial Subpoena to Solomon Gresen, Esq. and Application for Subpoena Duces Tecum for G. Smith to review & finalize; Prepare attorney service instructions re Trial Subpoena to Solomon Gresen, Esq. and Application for Subpoena Duces Tecum	1.2	SIF
02-13-12	Copy & serve Plaintiff's Notice to Appear at Trial	0.2	SIF
02-14-12	Proofread, spell-check, re-format, make minor revisions and requested revisions, and attach proofs of service to Plaintiff's opposition briefs to Defendant's Motions in Limine Nos. 1, 2, 3, 4 & 5, locate & copy documents for Exhibit "A" to MIL #5	3.2	SIF
02-15-12	Proofread, spell-check, re-format, make minor revisions and requested revisions, and attach proofs of service to Plaintiff's opposition briefs to Defendant's Motions in Limine Nos. 2 & 6, prepare declarations for G. Smith's signature for exhibits attached to opposition briefs to Motions in Limine Nos. 5 & 6, prepare same for filing & service	1.5	SIF
02-20-12	Prepare Trial Subpoenas for witnesses J. Lowers and T. Stehr	0.2	SIF

William Taylor v. City of Burbank
Los Angeles County Superior Court Case No. BC 422 252

Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
02-21-12	Letter to Phil Becker (Caveman PS) enclosing trial subpoenas re J. Lowers and T. Stehr; Create Plaintiff's witness list from handwritten list prepared by G. Smith based upon Dept. 50's requirements; Prepare for re-filing Plaintiff's opposition briefs to Defendant's Motions in Limine Nos. 1, 2, 3, 4 & 5, prepare attorney service instructions for same; Proofread, spell-check, re-format, make minor revisions, and attach proof of service to Plaintiff's opposition briefs to Defendant's Motion in Limine Nos. 7, prepare same for filing & service	2.2	SIF
02-22-12	Pull up CA <i>Penal Code</i> section and prepare format for Special Jury Instruction #3 to include authority and text; Pull up federal obstruction of justice statute and prepare format for Special Jury Instruction #4 to include authority and text; Prepare format for Special Jury Instruction Nos. 1 & 2; Type portions of CA <i>Govt. Code</i> section to format Special Jury Instruction No. 5	2.2	SIF
02-23-12	Prepare Joint List of Stipulated Facts based upon instructions from G. Smith; Create and enter exhibit description for Plaintiff's Exhibit List based upon stack of exhibits prepared by G. Smith; Prepare Plaintiff's Witness List to include name, time estimates, and type of witness based upon G. Smith's handwritten list	5.6	SIF
02-28-12	Prepare trial subpoenas for witnesses M. Ramos and C. Gunn; Prepare on-call agreements re trial subpoenas for witnesses M. Ramos and C. Gunn; Letter to M. Ramos enclosing trial subpoena & on-call agreement for signature & return; Letter to T. Gunn enclosing trial subpoena & on-call agreement for signature & return	1.0	SIF

William Taylor v. City of Burbank
Los Angeles County Superior Court Case No. BC 422 252

Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
03-01-12	Prepare trial subpoena for witness R. Kreisler and attorney service instructions for service of same on a rush basis; Revise List of Stipulated Facts on behalf of Plaintiff only, prepare attorney service instructions for filing & service of same on 03/02/12	0.5	SIF
03-02-12	Prepare Trial Subpoenas & witness fee payments for witnesses J. Gardiner, T. Stehr, J.J. Puglisi, G. Misquez, C. Varner, S. LaChasse, and C. Humiston, also witness fee payment only for M. Flad; Letter to Ronald Frank enclosing foregoing trial subpoenas, witness fee payments, and (3) volumes of Plaintiff's trial exhibit binders; Prepare & insert labels for (6) sets of Plaintiff's trial exhibit binders; Insert individual copies of Joint Exhibit List to (6) sets of Plaintiff's trial exhibit binders; Insert Karen Smith's Revised Report to (6) sets of Plaintiff's trial exhibit binders; Create list of Plaintiff's trial exhibit binder sets respectively designating each for Plaintiff's counsel, Judge, Clerk, & Witness; Page numbering for updated versions of Exhibit Nos. 7 through 10 to (5) sets; Email to Ronald Frank attaching updated versions of Exhibit Nos. 7 through 10; Prepare on-call agreement re trial subpoena for witness Richard Kreisler; Letter to Richard Kreisler on-call agreement for signature & return	5.5	SIF

William Taylor v. City of Burbank
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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
03-05-12	Page numbering for updated versions of Exhibit Nos. 1 through 6 for (5) sets of trial exhibit binders, print, organize, deliver same to Court	4.3	SIF
03-06-12	Letter to Defense Counsel enclosing Paul Kim's signed Declaration and Errata Sheet re transcript of deposition taken on 02/06/12	0.2	SIF
03-13-12	Take Special Verdict form prepared by C. Brizzolara and create Word version of same; Email Word and pdf versions of Special Verdict form to defense counsel	0.4	SIF
03-20-12	Letter to Dr. Stanley Majcher enclosing copy of his deposition transcript (per request); Format Proposed Judgment on General Verdict prepared by Plaintiff for submission to Court, prepare attorney service instructions for filing & service of same on 03/21/12	0.6	SIF
04-04-12	Format Plaintiff's Opposition to Defendant's Objection to Plaintiff's Proposed Judgment, prepare same for filing & service on 04/05/12	0.5	SIF
04-24-12	Format, proofread & spell-check Plaintiff William Taylor's declaration re Motion for Injunctive Relief for review & signature; Format, proofread, spell-check Plaintiff's Motion for Injunctive Relief, prepare same for filing & service on 04/25/12, prepare attorney service instructions for filing of same on 04/25/12	1.2	SIF
04-25-12	Revise Plaintiff's Motion for Injunctive Relief and prepare same for service on 04/25/12 and filing on 04/26/12	0.3	SIF
04-26-12	Gather data to include in Cost Bill and prepare Cost Bill (Summary & Worksheet) for G. Smith to review & finalize, prepare same for filing & service on 04/27/12	7.5	SIF

William Taylor v. City of Burbank
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Timesheet re: Selma I. Francia

DATE	DESCRIPTION OF WORK PERFORMED	HOURS	PARALEGAL
06-01-12	Take dictation from G. Smith re Plaintiff's Objection to Defendant's Reply to Plaintiff's Opposition to Motion for New Trial and in the Alternative JNOV, format and prepare same for filing & service, prepare Facsimile Transmission Cover Sheet	0.4	SIF
06-05-12	Format, proofread, spell-check Plaintiff's Opposition to Motion to Tax Costs, create list of entries for Items 1 & 5 in the Cost Bill to include as exhibits in the opposition, locate & copy exhibits to include, prepare draft of G. Smith's declaration, prepare same for filing & overnight service on 06/06/12	4.0	SIF
06-08-12	Draft S. Francia Declaration in support of Plaintiff's Motion for Attorney's Fees, calculate time and enter same in declaration	1.0	SIF
	TOTAL	118.5	

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 345E, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : June 11, 2012

DOCUMENT SERVED : **DECLARATION OF SELMA I. FRANCIA IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES**

PARTIES SERVED : **SEE ATTACHED SERVICE LIST.**

XXX (BY REGULAR MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Beverly Hills, California. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

XXX (BY ELECTRONIC MAIL) I caused such document to be electronically mailed to **Christopher Brizzolara, Esq.** at the following e-mail address: samurai@adelphia.net.

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on June 11, 2012.

Selma I. Francia

SERVICE LIST

WILLIAM TAYLOR v. CITY OF BURBANK
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC 422 252

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